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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

ALI SAREH, an individual	)	Case No.:
	)	
Plaintiff,	)	
	)	
vs.	)	
	)	
FARMERS INSURANCE EXCHANGE,	)	
d/b/a/ FARMERS; and DOES 1-X, inclusive,	)	
and ROE CORPORATIONS I-X, inclusive,	)	
	)	
Defendants.	)	

**PETITION FOR REMOVAL**

TO: THE CLERK OF THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEVADA:

PLEASE TAKE NOTICE that Defendant/Petitioner, Farmers Insurance Exchange (hereinafter "Defendant"), and through their attorneys, The Feldman Firm, hereby removes the State action described herein to Federal Court. The grounds for removal are as follows:

1. On August 1, 2017, an action was commenced in the Eighth Judicial District Court, Clark County, Nevada, entitled "*Ali Sareh vs. Farmers Insurance Exchange, d/b/a Farmers and Does 1-X, inclusive, and Roe Corporations I-X, inclusive*"; Case No. A-17-759300-C.
2. A copy of all process, pleadings and orders served upon Defendant Farmers Insurance Exchange in the State Court action are attached hereto as **Exhibit 1**.
3. This Petition is filed timely pursuant to 28 U.S.C. §1446(b).
4. This action is a civil action of which this Court has diversity jurisdiction under the

1 provisions of 28 U.S.C. §1332 and 28 U.S.C. §2201, and is one which may be removed to this  
2 Court by Petitioner pursuant to the provisions of 28 U.S.C. §1441(b).

3 5. There is a diversity of citizenship between Plaintiff Ali Sareh, and the insuring  
4 entity, Defendant Farmers Insurance Exchange. Defendant is informed and believes that Plaintiff,  
5 Ali Sareh was and still is a citizen of the State of Nevada. Defendant Farmers Insurance Exchange  
6 was at the time of the filing of this action, and still is a corporation incorporated in the State of  
7 California.

8 6. The matter in controversy exceeds \$75,000.00. In addition to Plaintiff seeking  
9 damages in an amount in excess of \$30,000.00 under the uninsured/underinsured portion of the  
10 policy of insurance with Mid-Century Insurance Company (See Complaint, p.3, enumerated  
11 paragraphs 12-13, attached hereto as **Exhibit 2**; Demand Letter from Plaintiff's counsel, Geoffrey  
12 W. Hawkins, Esq., dated November 7, 2016, p. 1, ¶ 3, seeking policy limits, attached here as  
13 **Exhibit 3**) (which has \$30,000.00 in underinsured motorist limits per person/\$60,000.00 for each  
14 occurrence (Id.)), Plaintiff seeks general damages for Breach of Contract for an amount in excess  
15 of \$15,000.00; Breach of The Implied Covenant of Good Faith and Fair Dealing damages in an  
16 amount in excess of \$15,000.00; Bad Faith damages in an amount in excess of \$15,000.00; Unfair  
17 Practices in Settling Claims damages in an amount in excess of \$15,000.00; special damages in  
18 excess of \$15,000.00; punitive damages in excess of \$15,000.00; and attorneys' fees and costs (See  
19 Complaint, **Exhibit 2**, p. 3, enumerated ¶ 16, p. 4, enumerated ¶ 26, p. 5, enumerated ¶ 32, p. 6,  
20 enumerated ¶ 38, p. 6, Prayer for Relief, enumerated items 1-4). When considered in the  
21 aggregate, the amount sought by Calhoun in the case at bar exceeds the \$75,000.00 jurisdictional  
22 limit at issue. Given those claims against this national insurance company, it is clear that Plaintiff  
23 is seeking punitive damages in excess of \$75,000.00.

24 7. Defendant was served through the Nevada Division of Insurance on August 8, 2017.  
25 (See Exhibit 1).

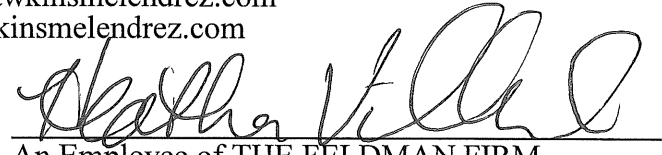
26 8. Pursuant to 28 U.S.C. §1446, a copy of this Petition for Removal is being filed with  
27 the Clerk of the Eighth Judicial District Court, Clark County, Nevada, and is further served on all  
28 parties hereto.



**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that on the 6 day of September, 2017, I mailed a true and correct copy of the foregoing **PETITION FOR REMOVAL** in a sealed envelope with postage fully prepaid addressed to the following:

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